

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

ANTHONY DERRICK CANNON,

CHAPTER 13

**CASE NO.** 1 - 19 -bk- 00173

**Debtor(s)**

CHARLES J. DeHART III  
STANDING CHAPTER 13 TRUSTEE,

**ADVERSARY NO.   -   ap-**  
**(if applicable)**

**Plaintiff(s)/Movant(s)**

vs.

## ANTHONY DERRICK CANNON.

### Nature of Proceeding:

## MOTION TO DISMISS CASE

**Defendant(s)/Respondent(s)**

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## REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

### Reason for the continuance.

Debtor filed an amended plan which is schedule for a confirmation hearing on August 28, 2019. Parties request that this Motion to Dismiss for Unconfirmable Plan be rescheduled to August 28, 2019.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 8/2/19

/s/ James K. Jones

Attorney for Movant

Name: James K. Jones

Phone Number: 717-566-6097 x123

<sup>1</sup> No alterations or interlineations of this document are permitted.